



JEFF ANDERSON & ASSOCIATES PA  
REACHING ACROSS TIME FOR JUSTICE

February 17, 2023

**VIA ECF**

The Honorable Dora L. Irizarry  
District Court Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Doe v. Warner et al.*, Case No. 2:23-cv-00862-DLI-ARL

Dear Judge Irizarry:

We are in receipt of Defendant Warner's request for a pre-motion conference with respect to the issue of the anonymous caption. In light of recent events, we believe that the conference will not be necessary.

As counsel correctly notes, this case arises out of sexual assault and was commenced in Nassau County Supreme Court. Plaintiff requested leave to proceed under a pseudonym pursuant to New York Law, but Defendant Warner filed to remove the case before such leave was granted. Since the filing of the state court lawsuit, Plaintiff's circumstances have materially changed because her identity and private information (including her email and home address) have been widely published on the Internet by individuals we believe are aligning themselves with this Defendant. The use of a pseudonym was intended to avoid this.

In light of this, Plaintiff can no longer be afforded the protection that she sought. As such, she is willing to proceed with an Amended Caption to use her true name.

Very truly yours,

Pat Stoneking  
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PS:lr

cc: Howard E. King, counsel for Brian Warner

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